

EXHIBIT J

From: [Canfield, Donna \(Law\)](#)
To: [John W. Moscow](#); lou@lapietrakrieger.com
Subject: Search Terms
Date: Wednesday, July 7, 2021 10:30:37 AM

Consistent with my email yesterday, I write to advise on the search terms we will be applying for the search outlined in the email below:

- (James w/3 O'Neill) OR Jimmy OR james.oneill@nypd.org
- Monahan OR Terry OR terrence.monahan@nypd.org
- Spinella OR Ray OR raymond.spinella@nypd.org
- Linder OR johnlinder@icloud.com OR johnlinder2@mac.com
- (John w/3 Miller) OR john.miller@nypd.org
- (Nilda w/3 Hoffman) OR Irrizarry
- Jaffe
- Pizzuti
- Purtell
- Fox
- "POC" OR "persons of color"
- "PWC" OR "Price Waterhouse Cooper"
- "Neighborhood Policing"

Please advise by Friday, July 9th if you have any modifications to the proposed search.

Donna

From: Canfield, Donna (Law)
Sent: Tuesday, July 06, 2021 12:26 PM
To: 'John W. Moscow'
Cc: lou@lapietrakrieger.com
Subject: RE: [External Email] RE: Please call

Counsel:

Defendants will be collecting from the email box of Simcha Eichenstein to review all emails sent to him on January 6-8, 2018. We will be producing all responsive emails.

Defendants will also be collecting from the email boxes of the Mayor, First Deputy Mayor Dean Fuleihan, and former First Deputy Mayor Anthony Shorris, Dominic Williams, and Emma Wolfe for the time period of 1/1/2017 and 4/30/2018. I will follow up with you tomorrow on the search terms we will be using.

Defendants anticipate that this will be the final ESI search in this matter.

Donna A. Canfield
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New York City Law Department
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Fax: (212) 356-2438
dcanfiel@law.nyc.gov

From: John W. Moscow [mailto:John.Moscow@LBKMLAW.com]
Sent: Friday, July 02, 2021 4:11 PM
To: Canfield, Donna (Law)
Subject: RE: [External Email] RE: Please call

WE WILL TRY TO FILE TODAY OR TOMORROW

From: Canfield, Donna (Law) <dcanfiel@law.nyc.gov>
Sent: Friday, July 2, 2021 3:41 PM
To: John W. Moscow <John.Moscow@LBKMLAW.com>
Subject: [External Email] RE: Please call

We just discussed this yesterday. You said you were uncertain when you would file. Please let me know if that has changed. If you have a date in mind for your motion, please let me know so I can consult internally regarding our opposition. Otherwise, I am available on Tuesday to discuss.

From: John W. Moscow [John.Moscow@LBKMLAW.com]
Sent: Friday, July 02, 2021 3:00 PM
To: Canfield, Donna (Law)
Subject: Please call

I have called twice. We should have a briefing schedule established
Please call me at 917-693-2265 as soon as possible.

Sent from my iPhone

Please note that the personnel of Lewis Baach Kaufmann Middlemiss are working remotely at this time due to the COVID-19 outbreak. Our personnel have secure remote access to our systems and software to perform essential functions so that we can continue to be responsive to clients and minimize any disruptions. You may continue to contact any of us through normal channels – telephone or email.

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